

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

<p>STATE OF TEXAS; STATE OF LOUISIANA,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p>v.</p> <p>UNITED STATES OF AMERICA, <i>et al.</i>,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p>Case No. 6:21-cv-00016</p>
--	-------------------------------

PLAINTIFFS' TRIAL EXHIBIT LIST

No.		Description	Offer	Object	Date Admit	Date N/Adm
A		January 20, 2021 Memorandum	X	N	2/22/22	
B		February 18, 2021 Memorandum	X	N	2/22/22	
C		Profiles for Inmates With ICE Detainers Dropped—January 20, 2020–February 15, 2022	X	N	2/22/22	
	1	<i>withdrawn</i>			N/A	
	2	<i>withdrawn</i>			N/A	
D		<i>withdrawn</i>			N/A	
	1	Curriculum Vitae of Thomas Homan	X	N	2/22/22	
	2	U.S. Immigration and Customs Enforcement Fiscal Year 2020 Enforcement and Removal Operations Report	X	N	2/22/22	
	3	Review of and Interim Revision to Civil Immigration Enforcement and Removal Policies and Priorities	X	N	2/22/22	

	4	Interim Guidance: Civil Immigration Enforcement and Removal Priorities	X	N	2/22/22	
	5	Guidelines for the Enforcement of Civil Immigration Law	X	N	2/22/22	
	6	ERO FY 2019 Achievement	X	N	2/22/22	
E		Declaration of Bill E. Waybourn (Tarrant County Sheriff)	X	N	2/22/22	
F		Declaration of Rebecca Waltz (Texas Department of Criminal Justice)	X	N	2/22/22	
G		Declaration of Susan Bricker (Texas Health and Human Services Commission)	X	N	2/22/22	
	1	Curriculum Vitae of Susan Bricker	X	N	2/22/22	
	2	Appendix B	X	N	2/22/22	
H		Declaration of Leonardo R. Lopez (Texas Education Agency)	X	N	2/22/22	
	1	Unaccompanied Children Released to Sponsors by State	X	N	2/22/22	
I		Declaration of Sean Grove (Texas Juvenile Justice Department)	X	N	2/22/22	
J		Texas Agreement	X	N	2/22/22	
K		Louisiana Agreement	X	N	2/22/22	
L		Declaration of Jonathan R. Vining (Louisiana Department of Public Safety and Corrections)	X	N	2/22/22	
M		Letter from DHS to Texas	X	N	2/22/22	
N		ICE FY2020 Enforcement and Removal Operations Report	X	N	2/22/22	
O		ICE FY2019 Enforcement and Removal Operations Report	X	N	2/22/22	
P		News Release; ICE Announces Case Review	X	N	2/22/22	

		Process				
Q		ICE Detention Data, FY2021 YTD	X	N	2/22/22	
R		ICE Detention Data, FY2020	X	N	2/22/22	
S		ICE Annual Report FY2020	X	N	2/22/22	
T		DOJ 2018 Update on Prisoner Recidivism	X	N	2/22/22	
U		Census Bureau Table: Geographic Mobility by Citizenship Status	X	N	2/22/22	
V		The Foreign-Born Population in Texas: Sources of Growth	X	N	2/22/22	
W		Gone to Texas	X	N	2/22/22	
X		September 30, 2021 Memorandum	X	N	2/22/22	
Y		Guidelines for the Enforcement of Civil Immigration Law	X	N	2/22/22	
Z		AART Broadcast Email – November, 2021	X	N	2/22/22	
AA		AART Quick Reference Guide – November, 2021	X	N	2/22/22	
BB		AART Broadcast Email – December, 2021	X	N	2/22/22	
CC		AART Quick Reference Guide – December, 2021	X	N	2/22/22	
DD		Termination of the Migrant Protection Protocols	X	N	2/22/22	
EE		Explanation of the Decision to Terminate the Migrant Protection Protocols	X	N	2/22/22	
FF		Email correspondence between Robert Moore, TDCJ and ICE Personnel	X	N	2/22/22	
	1	February 5, 2001 regarding Dropped Detainers-Sanches/Velazquez/Molina/Morales	X	N	2/22/22	
	2	February 5, 2021 regarding ICE Releases for 02/05/21	X	N	2/22/22	
	3	February 8, 2021 regarding Releases for 02/05/21 and Lift Detainers 02/08/21	X	N	2/22/22	

4	July 1, 2021 regarding Cancelled Detainers	X	N	2/22/22	
5	July 6, 2021 regarding Pedro Mendez-Mejia 2299278	X	N	2/22/22	
6	July 16, 2021 regarding Lifted Detainers Nogueranavas, Hernandez	X	N	2/22/22	
7	July 16, 2021 regarding Lifted Detainers- added Aaron Carrillo 2349610	X	N	2/22/22	
8	August 4, 2021 regarding Lifted Detainers Hernandez, Rosas-Castillo	X	N	2/22/22	
9	September 22, 2021 regarding Lifted Detainers Azizi, Nguyen, Ramirez-Mateo	X	N	2/22/22	
10	September 23, 2021 regarding Ice Detainer Cancellations	X	N	2/22/22	
11	September 28, 2021 regarding ICE Detainer Lifted for TDCJ# 02359524 Martinez Mendoza	X	N	2/22/22	
12	October 8, 2021 regarding Lifted Detainers Thong, Aguillar	X	N	2/22/22	
13	October 12, 2021 regarding Lifted Detainers Barcenaz, Marines	X	N	2/22/22	
14	November 3, 2021 regarding Lifted Detainers Tong Nguyen, Sanchez-Rodriguez	X	N	2/22/22	
15	November 17, 2021 regarding Lifted Detainers regarding Garcia, Reyes	X	N	2/22/22	
16	November 30, 2021 regarding Lifted Detainers Vasquez	X	N	2/22/22	
17	December 1, 2021 regarding Lifted Detainers Cruz and Thar	X	N	2/22/22	
18	December 2, 2021 regarding Lifted Detainers Garcia	X	N	2/22/22	
19	December 3, 2021 regarding Lifted Detainers Cervantez-Vasquez	X	N	2/22/22	

20	December 7, 2021 regarding Lifted Detainer Bonilla Garcia	X	N	2/22/22	
21	December 16, 2021 regarding Lifted Detainer Gandara, Castro-Velasquez, Vasquez Jose,	X	N	2/22/22	
22	December 17, 2021 regarding Lifted Detainers Fuerte Padilla, Perez-Palacios	X	N	2/22/22	

Date: February 22, 2022

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Texas Bar No. 00798537
Southern District of Texas Bar No. 1829509
patrick.sweeten@oag.texas.gov

BRENT WEBSTER
First Assistant Attorney General

JUDD E. STONE II
Solicitor General

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Texas Bar No. 24088531
Southern District of Texas Bar No. 3053077
will.thompson@oag.texas.gov

/s/ Ryan D. Walters

RYAN D. WALTERS
Attorney in Charge
Special Counsel
Texas Bar No. 24105085
Southern District of Texas Bar No. 3369185
ryan.walters@oag.texas.gov

ERIC A. HUDSON
Senior Special Counsel
Texas Bar No. 24059977
Southern District of Texas Bar No. 1000759

LEIF A. OLSON
Special Counsel
Texas Bar No. 24032801
Southern District of Texas Bar No. 33695

OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410

COUNSEL FOR PLAINTIFF STATE OF TEXAS

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL

/s/Elizabeth B. Murrill
ELIZABETH B. MURRILL
Solicitor General
JOSEPH S. ST. JOHN
Deputy Solicitor General

Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
murrille@ag.louisiana.gov
stjohnj@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF LOUISIANA

CERTIFICATE OF SERVICE

I certify that on February 22, 2022, this document was filed through the Court's CM/ECF system, which automatically serves it on all counsel of record.

/s/ Ryan D. Walters